

Law Office Copy
**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

CHARLES ISELEY,

Plaintiff

v.

W. CONWAY BUSHEY, et al.,

Defendants

**No. 1:00-CV-00577
(Judge Kane)**

FILED
HARRISBURG, PA

JUL 3 2000

MARY E. D'ANDREA, CLERK
Per *[Signature]*
Deputy Clerk

**DEFENDANTS' MOTION FOR AN ENLARGEMENT
OF TIME IN WHICH TO FILE A RESPONSE TO
PLAINTIFF'S MOTION TO CEASE RETALIATION**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, defendants, by their attorneys, move for an enlargement of time in which to file a response to plaintiff's motion to cease retaliation and in support hereof state as follows:

1. On June 28, 2000, plaintiff filed a Motion to Cease Retaliation Against Plaintiff and a brief in support of that motion.
2. Counsel for defendants received the motion and brief on July 3, 2000.
3. Pursuant to the Middle District Local Rules, defendants' response to the motion is due on or before July 16, 2000.
4. Counsel for defendants has long-standing plans to take a pre-paid family vacation from July 4, 2000 until July 16, 2000. Counsel will not be returning to the office until July 17, 2000.
5. Counsel is unable to prepare an appropriate response in opposition to the motion in the one day before she leaves for vacation.
6. Accordingly, defendants request an enlargement of time of ten days or until July 27, 2000 to respond to plaintiff's Motion to Cease Retaliation.

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7. Defendants have no reason to believe this short enlargement of time will prejudice plaintiff.

WHEREFORE, defendants respectfully request an enlargement of ten days to respond to plaintiff's Motion to Cease Retaliation.

Respectfully submitted,

D. MICHAEL FISHER
Attorney General

By:


MARYANNE M. LEWIS
Deputy Attorney General

SUSAN J. FORNEY
Chief Deputy Attorney General
Chief, Litigation Section

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DATE: JULY 3, 2000

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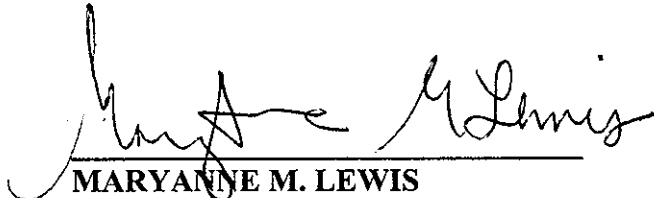
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CERTIFICATE OF SERVICE

I, Maryanne M. Lewis, Deputy Attorney General, hereby certify that on this date I caused to be served the foregoing Defendants' Motion for An Enlargement of Time In Which to File a Response to Plaintiff's Motion to Cease Retaliation, by depositing a copy of the same in the United States mail, postage prepaid, in Harrisburg, PA., addressed to the following:

Charles Iseley, #AM-9320
SCI-Coal Township
1 Kelley Drive
Coal Township, PA 17866-1020


MARYANNE M. LEWIS
DEPUTY ATTORNEY GENERAL

DATE: JULY 3, 2000